

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	:	PROMESA
	:	Title III
as representative of	:	Case No. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i> ,	:	(Jointly Administered)
Debtors. ¹	:	

**INFORMATIVE MOTION OF OFFICIAL COMMITTEE
REGARDING DECEMBER 20-21, 2017, OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all title III Debtors (other than COFINA) (the “Committee”) hereby submits this informative motion in response to the Court’s *Order Regarding the Location and Procedures for Attendance, Participation and Observation of the December 20-21, 2017 Omnibus Hearing*, dated December 1, 2017 [Docket No. 1893] (the “Scheduling Order”) and respectfully states as follows:

1. Luc A. Despins of Paul Hastings LLP will appear in person on behalf of the Committee at the December Omnibus Hearing (as defined in the Scheduling Order) in

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Courtroom 17C of the United States District Court for the Southern District of New York, and address, as necessary, the following matters:

- (a) *Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004* [Docket No. 1873];
 - (i) *Limited Joinder Of Official Committee Of Unsecured Creditors To Ambac Assurance Corporation's Motion For Entry Of Order Authorizing Discovery Under Bankruptcy Rule 2004* [Docket No. 1897];
- (b) *The Puerto Rico Funds' Motion Conditioning the Automatic Stay on the Continuation of ERS Bondholder Protections or, Alternatively, to Enforce the Court's July 17, 2017 Order* [Docket No. 1866];
 - (i) *ERS's Opposition to the Puerto Rico Funds' Motion Conditioning the Automatic Stay on the Continuation of ERS Bondholder Protections or, Alternatively, to Enforce the Court's July 17, 2017 Order* [Docket No. 1978];
 - (ii) *Joinder of Official Committee of Unsecured Creditors in ERS's Opposition to the Puerto Rico Funds' Motion Conditioning the Automatic Stay on the Continuation of ERS Bondholder Protections or, Alternatively, to Enforce the Court's July 17, 2017 Order* [Docket No. 1983]
- (c) *Motion of Financial Oversight and Management Board for Puerto Rico for Entry of Order (A) Confirming Scope of COFINA and Commonwealth Agents' Authority Under Stipulation and Order and (B) Determining Certain Claims to Exceed Scope of the Commonwealth-COFINA Dispute* [Adv. Proc. No. 17-257, Docket No. 109];

- (i) *Limited Joinder of Commonwealth Agent to (I) Motion of Financial Oversight and Management Board for Puerto Rico for Entry of Order (A) Confirming Scope of COFINA and Commonwealth Agents' Authority Under Stipulation and Order and (B) Determining Certain Claims to Exceed Scope of the Commonwealth-COFINA Dispute and (II) AAFAF's Motion to Enforce the Stipulation and Order Approving Procedure to Resolve Commonwealth-COFINA Dispute and to Dismiss Unsanctioned Claims and Counterclaims* [Adv. Proc. No. 17-257, Docket No. 108];
- (ii) *Commonwealth Agent's Objection to Scope Motions of Oversight Board, AAFAF, and Ambac with Respect to Claims of Commonwealth Agent* [Adv. Proc. No. 17-257, Docket No. 149];
- (d) *AAFAF's Motion to Enforce the Stipulation and Order Approving Procedure to Resolve Commonwealth-COFINA Dispute and to Dismiss Unsanctioned Claims and Counterclaims* [Adv. Proc. No. 17-257, Docket No. 104];
- (e) *Intervenor-Defendant Ambac Assurance Corporation's Motion to Strike the Commonwealth Agent's Constitutional and Avoidance Claims as Beyond the Scope of the Commonwealth-COFINA Dispute* [Adv. Proc. No. 17-257, Docket No. 105];
- (f) Any objections, responses, joinders, or replies to any of the foregoing pleadings; and
- (g) Any statements made by any party in connection with the title III cases or any adversary proceeding pending therein.

2. The Committee anticipates that a total of three representatives (two attorneys and one financial advisor) will attend the December Omnibus Hearing at the United States District Court for the Southern District of New York.

3. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and one of his co-counsel will attend, on behalf of the Committee, the December Omnibus Hearing at the United States District Court for the District of Puerto Rico.

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WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: December 15, 2017

/s/ G. Alexander Bongartz

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- and -

/s/ Juan J. Casillas Ayala

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